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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In re: :  
: Chapter 11  
Alexander Gallo Holdings, LLC,<sup>1</sup> :  
:  
Debtor. : Case No. 11-\_\_\_\_\_ ( )  
-----X  
In re: :  
: Chapter 11  
Set Depo, LLC, :  
:  
Debtor. : Case No. 11-\_\_\_\_\_ ( )  
-----X  
In re: :  
: Chapter 11  
AG/Sanction LLC, :  
:  
Debtor. : Case No. 11-\_\_\_\_\_ ( )  
-----X  
In re: :  
: Chapter 11  
Unlimited Languages, Inc., :  
:  
Debtor. : Case No. 11-\_\_\_\_\_ ( )  
-----X

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<sup>1</sup> The Debtors, together with the last four digits of each Debtor's federal tax identification number, are: Alexander Gallo Holdings, LLC (4040); Set Depo, LLC (4236); AG/Sanction LLC (2187); Unlimited Languages, Inc. (7755); The Hobart West Group, Inc. (9849); Deponet, LLC (0336); Esquire Deposition Services, LLC (9684); Esquire Litigation Solutions, LLC (0947); Esquire Solutions, LLC (9382); Hobart West Solutions, LLC (6005); and D-M Information Systems, Inc. (3504).

In re:	:	
	:	Chapter 11
The Hobart West Group, Inc.,	:	
	:	
	Debtor.	:
	:	Case No. 11-_____ ( )
		X
In re:	:	
	:	Chapter 11
Deponet, LLC,	:	
	:	
	Debtor.	:
	:	Case No. 11-_____ ( )
		X
In re:	:	
	:	Chapter 11
Esquire Deposition Services, LLC,	:	
	:	
	Debtor.	:
	:	Case No. 11-_____ ( )
		X
In re:	:	
	:	Chapter 11
Esquire Litigation Solutions, LLC,	:	
	:	
	Debtor.	:
	:	Case No. 11-_____ ( )
		X
In re:	:	
	:	Chapter 11
Esquire Solutions, LLC,	:	
	:	
	Debtor.	:
	:	Case No. 11-_____ ( )
		X
In re:	:	
	:	Chapter 11
Hobart West Solutions, LLC,	:	
	:	
	Debtor.	:
	:	Case No. 11-_____ ( )
		X
In re:	:	
	:	Chapter 11
D-M Information Systems, Inc.,	:	
	:	
	Debtor.	:
	:	Case No. 11-_____ ( )
		X

**DEBTORS' MOTION PURSUANT TO FED. R. BANKR. P. 1015(b)**  
**REQUESTING JOINT ADMINISTRATION OF CHAPTER 11 CASES**

Alexander Gallo Holdings, LLC and certain of its subsidiaries and affiliates, as debtors and debtors in possession (collectively, the “Debtors”), by and through their proposed undersigned counsel, hereby submit this motion (the “Motion”), pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), for entry of an order, substantially in the form attached hereto as Exhibit A, directing the joint administration of the Debtors’ chapter 11 cases for procedural purposes only. In support of this Motion, the Debtors respectfully represent as follows:

**JURISDICTION**

1. This Court has subject matter jurisdiction to consider and determine this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory basis for the relief requested herein is Bankruptcy Rule 1015(b).

**BACKGROUND**

2. On September 7, 2011 (the “Petition Date”), each of the Debtors filed with this Court a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”).

3. The Debtors are continuing to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

4. No trustee, examiner or committee has been appointed in any of the Debtors’ chapter 11 cases.

5. Additional information regarding the Debtors' businesses, capital structure, and the circumstances leading to these chapter 11 cases is contained in the Affidavit of Marc L. Pfefferle Pursuant to Local Bankruptcy Rule 1007-2 in Support of First Day Motions (the "First Day Affidavit") filed contemporaneously herewith.

**RELIEF REQUESTED**

6. By this Motion, the Debtors respectfully request entry of an order, substantially in the form attached hereto as Exhibit A, directing the joint administration of the Debtors' chapter 11 cases for procedural purposes only.

**BASIS FOR RELIEF REQUESTED**

7. Bankruptcy Rule 1015(b) provides, in pertinent part, that if "two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates." Fed. R. Bankr. P. 1015(b). The Debtors are "affiliates" as such term is defined in section 101(2) of the Bankruptcy Code. 11 U.S.C. § 101(2). Accordingly, this Court is authorized to grant the requested relief.

8. On the date hereof, the Debtors commenced the above-captioned chapter 11 cases by filing the appropriate petitions with this Court. Given the provisions of the Bankruptcy Code and the Bankruptcy Rules, as well as the Debtors' affiliation, joint administration of these cases is warranted. Joint administration will avoid the preparation, replication, service, and filing, as applicable, of duplicative notices, applications, and orders, thereby saving the Debtors considerable expense and resources.

9. The relief requested will not adversely affect creditors' rights, as this Motion requests only the administrative, not substantive, consolidation of the estates. In fact, the

reduced costs that will result from the joint administration of these cases will inure to the benefit of all creditors. The relief requested also will relieve the Court of the burden of entering duplicative orders and maintaining duplicative files, as well as simplify supervision of the administrative aspects of these chapter 11 cases by the Office of the United States Trustee for the Southern District of New York (the “U.S. Trustee”).

10. Accordingly, the Debtors respectfully request that the Debtors’ chapter 11 cases be administered under a consolidated caption as follows:

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In re : Chapter 11  
: :  
ALEXANDER GALLO HOLDINGS, : Case No. 11-\_\_\_\_\_ ( )  
LLC, *et al.*, :  
: (Jointly Administered)  
Debtors. :  
-----X

11. The Debtors seek the Court’s direction that in each of the Debtors’ cases, a notation substantially similar to the following notation be entered on the docket to reflect the joint administration of these cases:

An Order has been entered in this case directing the procedural consolidation and joint administration of the chapter 11 cases of Alexander Gallo Holdings, LLC; Set Depo, LLC; AG/Sanction LLC; Unlimited Languages, Inc.; The Hobart West Group, Inc.; Deponet, LLC; Esquire Deposition Services, LLC; Esquire Litigation Solutions, LLC; Esquire Solutions, LLC; Hobart West Solutions, LLC; and D-M Information Systems, Inc. The docket in Case No. 11-\_\_\_\_\_ ( ) should be consulted for all matters affecting this case.

12. Finally, the Debtors seek authority to file the monthly operating reports required by the U.S. Trustee’s Operating Guidelines on a consolidated basis; provided, however, that the

Debtors shall indicate disbursements separately for each individual Debtor. Consolidated monthly operating reports shall further administrative economy and efficiency without prejudice to any party in interest.

13. In view of the benefits attendant to the joint administration of these chapter 11 cases and the absence of any harm to any party in interest, the Debtors submit that the relief requested is appropriate and should be granted in all respects.

**NOTICE**

14. No trustee or examiner has been appointed in these chapter 11 cases. The Debtors have served notice of this Motion on: (a) the Office of the United States Trustee for the Southern District of New York; (b) the Debtors' secured lenders; and (c) those creditors holding the thirty largest unsecured claims against the Debtors on a consolidated basis (collectively, the "Notice Parties"). The Debtors submit that, in light of the nature of the relief requested, no other or further notice is necessary or required.

**NO PRIOR REQUEST**

15. No previous request for the relief sought herein has been made by the Debtors to this or any other court.

WHEREFORE, the Debtors respectfully request that the Court enter an order, substantially in the form attached hereto as Exhibit A, granting the relief requested herein and granting such other and further relief as the Court deems just and proper.

Dated: September 7, 2011  
New York, New York

/s/ Thomas R. Califano  
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